

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
CONVERIUM HOLDING AG,	:	
	:	
Plaintiff,	:	CIVIL ACTION NO. 07 CV 3042
- against -	:	
	:	
SCOR S.A. AND PATINEX AG,	:	
	:	
Defendants.	:	
	:	
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NOTICE OF MOTION

PLEASE TAKE NOTICE that plaintiff, Converium Holding AG, will move this Court before the Honorable Gerard E. Lynch, United States District Judge, Southern District of New York, in Room 910 at the United States Courthouse, New York, New York, on April 19, 2007 at 4:30 p.m., or as soon thereafter as counsel may be heard, for an order granting plaintiff expedited discovery as follows:

(1) authorizing plaintiff to serve and conduct certain discovery, including but not limited to, requests for the production of documents and depositions of key witnesses with knowledge of the facts underlying certain allegations in the complaint, including certain officers, directors and shareholders of defendants and persons identified in defendants' discovery responses and deposition testimony, on an expedited discovery schedule; and

(2) establishing an expedited schedule for the completion of discovery and briefing and a hearing on a motion for injunctive relief as follows:

(a) Defendants will produce documents in response to plaintiff's document requests on or before April 27, 2007;

(b) Defendants will produce witness(es) in response to plaintiff's Notices of Deposition on or before May 4, 2007;

(c) Plaintiff will submit its opening papers in support of its preliminary injunction motion on or before May 10, 2007;

(d) Defendants will respond to plaintiff's preliminary injunction motion on or before May 14, 2007;

(e) Plaintiff will submit its reply papers on its preliminary injunction motion on or before May 16, 2007;

(f) The hearing on plaintiff's preliminary injunction motion is, subject to the Court's calendar, scheduled for May 18, 2007.

New York, New York
April 18, 2007

WILLKIE FARR & GALLAGHER LLP

By: 

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